

## **REMARKS**

### **SUMMARY**

In the subject Office Action, claims 19-23 stand rejected under 35 U.S.C. §112, second paragraph as being indefinite for "failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention"; Claims 1-4, 10-11 and 17-21 stand rejected under 35 U.S.C. §102(e) as being anticipated by Simmons (USP 5974451) and van Hoff (USP 5822539); Claims 24-25 and 29 stand rejected under 35 U.S.C. §102(e) as being anticipated by Haserodt (USP 6031836); Claim 30 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Haserodt as applied to claim 29, and further in view of Rondeau (USP 5850433); Claims 6-9 and 22 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Simmons/Van Hoff as applied to claims 1 and 19, and further in view of Rondeau (USP 5850433); and Claims 13-16 and 23 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Simmons/Van Hoff as applied to claims 1 and 19, and further in view of Haserodt (USP 6031836).

Claims 5, 12, 26-28, and 31-32 were previously cancelled; Claims 2-4, 6-11, 13-15, 20-25, 29-30 have been once amended; and Claims 1 and 16-19 have been twice amended.

### **CLAIM REJECTIONS UNDER 35 U.S.C. §112 SECOND PARAGRAPH**

Applicants have amended claim 19 to recite that the content-adding logic is operative to provide additional content to the client system if **the additional content** is to be provided (emphasis added). Accordingly, Applicants respectfully submit that the

rejections to claims 19-23 under 35 U.S.C. §112 second paragraph have been overcome.

**CLAIM REJECTIONS UNDER 35 U.S.C. §102(e) (SIMMONS)**

Claims 1-4, 10-11 and 17-21 stand rejected under 35 U.S.C. §102(e) as being anticipated by Simmons. Applicants respectfully point out that Simmons was filed on May 30, 1997 claiming the benefit of U.S. Provisional Application No. 60/027,677, filed October 7, 1996. On March 14, 1997 Applicants submitted a Declaration of Inventors Pursuant to 37 CFR §1.131 evidencing a conception date of at least as early as September 23, 1996, which is prior to Simmon's apparent priority date of October 7, 1996. Accordingly, Applicants respectfully submit that Simmons does not constitute a proper prior art reference under §102(e) and request that the rejections to claims 1-4, 10-11 and 17-21 under §102(e) be removed.

**CLAIM REJECTIONS UNDER 35 U.S.C. §102(e) (VAN HOFF)**

Claim 1 (as amended) of the present application recites a method comprising:  
receiving by said bridge server from a client system a request for content targeting a network server; and  
providing by said bridge server, in response to said received request, additional content to the client system, in addition to the requested content to be provided to the client system by the network server.

Thus, in claim 1 a bridge server receives from a client system, a request for content targeting a network server. In response to the received request, the bridge server provides additional content to the client system in addition to the content provided to the client system by the network server (emphasis added). Accordingly, the substance of the

content received from the network server remains unchanged. That is, the client system will view the unchanged content from the network server except that it will be accompanied by the additional content (where additional content may also include a link to content) displayed e.g. within a frame of the browser (*see* e.g. specification page 16, lines 5-8).

VAN HOFF on the other hand describes an automated document annotation system that adds hypertext cross-references to a set of known information sources *into documents* requested by a client computer in such a way that **the merged document** is displayable by existing Web browsers. An annotation proxy is *configured to merge a requested document from a first server with hypertext links to documents containing associated supplemental information*. The annotation proxy *then relays the merged document* to a receiver unit . . . , which ultimately displays the **merged document**. (*see* e.g. Abstract). Thus, in VAN HOFF, a client systems requests a document which is provided from a first server to an annotation proxy, where the document is merged with hypertext links to documents containing associated supplemental information. The annotation proxy then forwards, or relays the merged document (i.e. the document requested from the server along with integrated annotations) to the client system for display. The system in VAN HOFF DOES NOT describe the first server providing the content to the client system which is then accompanied at the client system with additional information (including actual content and/or links to content) provided by the proxy.

Although VAN HOFF describes that the proxy server 118 can be resident on the

requesting client computer 102 as well as remotely located, the original content is integrated with annotations prior to its being transmitted to client computer 102 or being displayed in browser 110. More specifically, if the proxy server 118 is provided on the requesting client computer 102, information server 104 provides the requested document to the proxy server 118 which applies the identified annotation (directory) to the received document, and provides the resulting merged document to the browser 110 for viewing on the requesting client computer 102 (*see e.g.* column 6, lines 33-47). If the annotation is performed on a remote proxy server 118, then annotation is performed prior to transmission of the document to client 102 (*see e.g.* column 6, lines 48-56; emphasis added).

Furthermore, in addition to the deficiencies described above with respect to VAN HOFF, Applicants respectfully submit that the proxy server described in VAN HOFF is not a bridge server as described in the present application. Thus, for at least the reasons set forth above with respect to independent claim 1, Applicants submit that claim 1 is allowable over VAN HOFF. As independent claim 19 contains limitations similar to those of claim 1, Applicants further submit that claim 19 is allowable over VAN HOFF. Moreover, Applicants submit that by virtue of at least their dependency on claims 1 and 19, claims 2-4, 10-11, 17-18, and 20-21 are also patentable over VAN HOFF.

#### **CLAIM REJECTIONS UNDER 35 U.S.C. §102(E) (HASERODT)**

Claim 24 recites a method comprising:

receiving by the bridge server a request for content from a client system targeting a network server; and

marking up by the bridge server the received request and returning the marked up request to the client system for re-submission.

Thus in claim 24, a bridge server (first device) receives a request from a client system (second device) for content targeting a network server (third device). The bridge server then marks up the received request which is then returned to the client system for re-submission (emphasis added). In the method of claim 24, the bridge server performs the mark-up on the client request targeting the network server, which is then returned to the client for re-submission.

HASERODT describes a system in which a user of a client (101) uses a browser (113) to select a web page (115) from a World Wide Web server (104), which is then downloaded to the browser (113). The downloaded page (115) carries a blank feature form – one on which features are not selected and parameters are not filled out, which is then displayed to the user. The user is then able to use the browser (113) to mark up the feature form. That is, the user selects individual features and fills in parameter values on the feature form. The browser (113) then uploads the page that was marked up by the user, back to the server (104) (see e.g. column 3 line 56 to column 4 line 5). Thus in HASERODT, the user is performing the mark-up and NOT the WWW server. Even if one were to assume arguendo, that the WWW server was performing the mark-up, the user's request (i.e. selection of web page 115) is directed to WWW server 104 which is (allegedly) performing the mark-up. In claim 24, the users request is directed (i.e. targeted) towards a network server other than the server performing the mark-up (i.e. bridge server).

Claim 29 is directed to a client system reciting limitations similar to those of

claim 24. More specifically, claim 29 describes a client system (first device) having control logic operative to transmit a request that targets a network server (second device) and to re-transmit the request in a marked up form, upon receiving return of the request in said marked up form from a bridge server (third device). Thus, the client re-transmits a request targeting a network server that has been marked-up by a bridge server. In HASERODT (as described above), the user performing the mark-up rather than the WWW server. Even if it were argued that the WWW server were performing the mark-up (which Applicant states is not the case), the user's request is nonetheless directed to WWW server rather than being directed towards a network server other than the server performing the mark-up.

Thus, for at least the reasons set forth above with respect to independent claims 24 and 29, Applicants submit that claims 24 and 29 are allowable over HASERODT. Applicants further submit that by virtue of at least their dependency on claims 24 and 29, claims 25 and 30 are also patentable over HASERODT.

#### CLAIM REJECTIONS UNDER 35 U.S.C. §103(A)

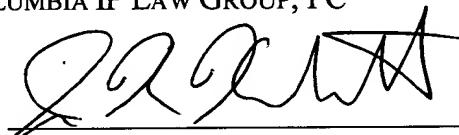
Claims 6-9, 13-16, 22-23 and 30 stand rejected under 35 U.S.C. §103(a) as being unpatentable over various combinations of HASERODT, SIMMONS/VAN HOFF and RONDEAU. Applicants submit that for at least the reasons set forth above, HASERODT, SIMMONS/VAN HOFF and RONDEAU, alone or in combination do not cure the deficiencies described above with respect to claims 1, 19, 24 and 29.

**CONCLUSION**

In view of the foregoing, Applicants submit that claims 1-4, 6-11, 13-25 and 29-30 are in condition for allowance. Early issuance of the Notice of Allowance is respectfully requested. Should there be any lingering questions over the patentability of the remaining pending claims, Applicants counsel respectfully requests the Examiner to call the undersign to resolve them.

Respectfully submitted,  
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**VERSION WITH MARKINGS TO SHOW CHANGES MADE**

**Claim 1 has been amended as follows:**

1. (Twice Amended) In a bridge server, a method comprising:

receiving by said bridge server from a client system a request for content targeting a network server; and  
providing by said bridge server, in response to said received request, additional content to the client system, in addition to the requested content to be provided to the client system by the network server.

**Claim 16 has been amended as follows:**

16. (Twice Amended) The method of claim 1, wherein said providing comprises returning by the bridge server a HyperText Markup Language (HTML) page to the client system, wherein the HTML page includes a marked version of the request for re-submission by the client system.

**Claim 17 has been amended as follows:**

17. (Twice Amended) The method of claim 1, wherein said providing comprises returning by said bridge server a HyperText Markup Language (HTML) page to the client system, wherein the HTML page includes an identifier of the additional content for the client system to retrieve the additional content.

**Claim 18 has been amended as follows:**

18. (Twice Amended) The method of claim 1, wherein said providing comprises returning a HyperText Markup Language (HTML) page to the client system, wherein the

HTML page includes the additional content.

**Claim 19 has been amended as follows:**

19. (Twice Amended) A bridge server comprising:

control logic operative to receive a request for content from a client system targeting a network server, and to check whether additional content is to be provided to the client system, in addition to the requested content to be provided to the client system by the network server; and

content-adding logic, coupled to the control logic, operative to provide the additional content to the client system if it the additional content is to be additionally provided.